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8 Attorney for TRACY HOPE DAVIS
 9 United States Trustee for Region 17

10 **UNITED STATES BANKRUPTCY COURT**
 11 **DISTRICT OF NEVADA**

12 In re:

13 SILVER STATE BROADCASTING, LLC,

14 AFFECTS THIS DEBTOR

15 AFFECTS GOLDEN STATE
 16 BROADCASTING, LLC

17 AFFECTS MAJOR MARKET
 18 RADIO, LLC

19 AFFECTS ALL DEBTORS

20 Debtor(s).

21 Case No. BK-21-14978-ABL

Chapter 11

Jointly administered with:

Golden State Broadcasting, LLC,
 Case No. 21-14979-ABL

Major Market Radio, LLC,
 Case No. 21-14980-ABL

Hearing Date: *OST Requested*

Hearing Time: *OST Requested*

Location: *OST Requested*

22 **DECLARATION OF JUSTIN C. VALENCIA IN SUPPORT OF THE**
 23 **UNITED STATES TRUSTEE'S MOTION FOR ORDER SHORTENING TIME**
 24 **ON THE UNITED STATES TRUSTEE'S MOTION TO APPOINT**
 25 **CHAPTER 11 TRUSTEE UNDER 11 U.S.C. § 1104(a), OR, IN THE**
 26 **ALTERNATIVE, TO CONVERT CASE TO CHAPTER 7 PURSUANT**
 27 **TO 11 U.S.C. § 1112(b); AND MEMORANDUM OF POINTS AND**
AUTHORITIES IN SUPPORT AND RESERVATION OF RIGHTS

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1 I, Justin C. Valencia, declare as follows:

2 1. I am a Trial Attorney for the United States Department of Justice, Las Vegas,
3 Nevada Office of the United States Trustee, Region 17 (“UST”).
4

5 2. I make this Declaration in support of the *United States Trustee’s Motion to*
6 *Appoint Chapter 11 Trustee Under 11 U.S.C. § 1104(a), or, in the Alternative, to Convert Case*
7 *to Chapter 7 Pursuant to 11 U.S.C. § 1112(b); and Memorandum of Points and Authorities in*
8 *Support and Reservation of Right* (“Motion”) filed in the above-captioned jointly administered
9 chapter 11 cases.
10

11 3. There are compelling reasons for scheduling an expedited hearing on the Motion.
12 The above-named jointly administered Debtors have failed to comply with their fiduciary duties
13 including the filing or the timely filing of MORs; the payment of UST fees; confirm a plan of
14 reorganization within a reasonable amount of time and otherwise failing to prosecute these cases
15 timely; have net operating losses; have failed to provide proof of insurance; and, are corporate
16 debtors and do not currently have counsel of record.
17

18 4. Attached as Exhibits “1” and “2” hereto are true and correct copies of the Motion
19 and supporting Declaration as required by Local Bankruptcy Rule 9006(a).
20

21 I declare under penalty of perjury that the foregoing statements are true and correct.
22

23 Executed in Las Vegas, Nevada on February 17, 2023.
24
25

26
27
28
/s/ Justin C. Valencia
Justin C. Valencia
Trial Attorney
for the United States Trustee